

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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IN RE REGIONS MORGAN KEEGAN  
SECURITIES, DERIVATIVE and ERISA  
LITIGATION

This Document Relates to:

*In re Regions Morgan Keegan Open-End  
Mutual Fund Litigation,*  
No. 2:07-cv-02784-SHM-dkv

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MDL Docket No. 2009

Judge Samuel H. Mays, Jr.

Magistrate Judge Diane K. Vescovo

**LEAD PLAINTIFFS' UNOPPOSED MOTION TO EXCEED PAGE LIMIT AND  
MEMORANDUM IN SUPPORT**

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### **Motion**

Come now Lead Plaintiffs,<sup>1</sup> in *In re Regions Morgan Keegan Open-End Mutual Fund Litigation*, Case No. 2:07-cv-02784-SHM-dkv (the “*Class Action*”), by their counsel, and respectfully move this Court for leave to exceed the page limit set forth in Local Rule 7.2(e) in filing their memorandum in support of their proposed Motion for Preliminary Approval of Class Settlement and Providing for Notice (the “*Class Settlement Preliminary Approval Motion*”), which Lead Plaintiffs will be filing with the Court seeking the Court’s preliminary approval of the proposed settlement in the *Class Action* (“*Class Settlement*”) and certification of the class for settlement purposes (the “*Settlement Class*”). Counsel for Lead Plaintiffs request the Court to grant them leave to file a memorandum in support of the *Class Settlement Preliminary Approval Motion* (“*Class Settlement Preliminary Approval Memorandum*”) of up to 30 pages in length. See ECF No. 411 in Case No. 07-2784 wherein Lead Plaintiffs notified the Court that Lead Plaintiffs and Defendants in the *Class Action* have agreed to terms for settling the *Class Action*, subject to this Court’s approval.

### **Memorandum in Support**

Pursuant to LR 7.2(e) of the Local Rules of the United States District Court for the Western District of Tennessee, unless otherwise ordered by the Court, memoranda in support of motions shall not exceed 20 pages in length. Due to the complexity of the *Class Action*, the complex nature of the issues to be addressed concerning the proposed settlement of the *Class Action*, and the many important points to be addressed in the *Class Action Preliminary Approval Memorandum*, such as: (i) the reasonableness of the proposed *Class Settlement*, (ii) the adequacy of the proposed *Class Settlement*, (iii) the forms and methods to be approved for disseminating notice to the *Settlement Class*, and (iv) the appointment of a claims administrator to administer the *Class Settlement*, as well

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<sup>1</sup> Lead Plaintiffs are the Kathryn S. Cashdollar Estate, Dajalis Ltd., Jeanette H. Landers, H. Austin Landers, and Frank D. Tutor.

as numerous other important matters to be addressed in the Class Settlement Preliminary Approval Memorandum, Lead Plaintiffs request permission to file a Class Settlement Preliminary Approval Memorandum of up to thirty (30) pages in length in support of their Class Settlement Preliminary Approval Motion.

**Certificate of Consultation**

Pursuant to Rule LR7.2(a)(1)(B) of the Local Rules of the United States District Court for the Western District of Tennessee, filed herewith is a Certificate of Consultation with Counsel affirming that counsel for Plaintiffs and Defendants have consulted with one another concerning this Motion for Leave to Exceed Page Limitation. As stated in the Certificate of Consultation, Defendants do not oppose Plaintiffs' Motion.

**Proposed Order**

A proposed Order granting this Motion for Leave to Exceed Page Limitation is being forwarded to the Court by e-mail transmission in accordance with the requirements of LR7.2(a)(1)(A).

DATED: January 20, 2015

Respectfully submitted,

**APPERSON CRUMP PLC**

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 20, 2015, the foregoing document was filed with the Clerk of Court by using the CM/ECF system, which system will send a notice of the electronic filing of same to the following:

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